IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

COURTNEY E. ROBINSON :

DEBTOR : BANKRUPTCY NO.: 18-15085-AMC

RESPONSE TO CERTIFICATION OF DEFAULT

Debtor ("Respondent"), by their attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Certification of Default, respectfully represents the following:

- 1. Debtor has cured the alleged default referenced in Movant's Certification of Default ("Certification").
- 2. On July 24, 2023, Debtor sent a payment, sufficient to cure the alleged default, to Movant via express, overnight delivery. Said payment is in the possession of the Movant.
- 3. Therefore, Debtor is no longer in default and requests that Movant withdraw the Certification. Alternatively, the Debtor requests a hearing be set on this matter.

WHEREFORE, Debtor prays that this honorable Court set a hearing on this matter.

Date: July 31, 2023 /s/ Brandon J. Perloff

Brandon J. Perloff Esquire. bperloff@perlofflaw.com

215-287-4231

Attorney for Debtor